



**Phillips Lytle** LLP

*VIA ECF and Fax (212) 805-7942*

April 13, 2015

Hon. Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
Room 1050  
500 Pearl Street  
New York, New York 10007

Re: Vera, *et al.* v. The Republic of Cuba, *et al.*  
Case No. 1:12-cv-01596 (AKH)

Dear Judge Hellerstein:

We represent Respondent/Garnishee HSBC Bank USA, N.A. ("HSBC") in this judgment enforcement proceeding and write jointly on behalf of the Garnishee Banks previously identified in our letter of March 31, 2015.<sup>1</sup>

In the scheduling order issued on April 1, 2015 (Dkt. No. 746), your Honor indicated that "[a] stay need not be considered at this time, since the effective date of turnover pursuant to my prior order is April 14, 2015."

Given that the effective date of turnover in your prior order is tomorrow, the Garnishee Banks respectfully renew their request for a short adjournment of that date pending your Honor's ruling on their motion for reconsideration in order to permit a fulsome consideration of the parties' submissions and to permit an orderly closing of blocked accounts and the processing of payments (perhaps three business days), or any other disposition, should that ruling contemplate turnover of the funds at issue.

Thank you for your consideration.

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<sup>1</sup> The Garnishee Banks are HSBC, Bank of America, N.A., Barclays Bank PLC, Citibank, N.A., JPMorgan Chase Bank, N.A., UBS AG, Wells Fargo Bank, N.A., Deutsche Bank Trust Company Americas, The Bank of New York Mellon, Standard Chartered Bank and Banco Bilbao Vizcaya Argentaria, S.A.

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Respectfully submitted,

Phillips Lytle LLP

By /s/ Sean C. McPhee

Sean C. McPhee

cc All Counsel of Record (via ECF)